



November 21, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

RE: Proposed Draft Guidelines for implementation of SB 743 related projects.

Dear Mr. Calfee,

On behalf of the Irvine Chamber of Commerce and its 800 members which represent thousands of employees, I am writing to urge you to make several needed changes to the implementation guidelines as they are currently written, and follow through with the original intention of SB 743 focusing on development of transit priority projects in alignment with SB 375 and AB 32.

Changing of the impact analysis metric to Vehicle Miles Traveled from the traditional Level of Service will present many challenges that builders and regulators are unlikely to be able to fully overcome. The inapplicability of this regulatory transition coupled with the susceptibility of mitigation measures to frivolous lawsuits due to a lack of quantifiable impact assessment modeling tools leads us to believe this will be detrimental for our members and our community.

The Irvine Chamber recommends that the implementation of the VMT metric be delayed, and remove any language that would establish VMT as the best measure for the time being. SB 743's intent seems to be that of streamlining the CEQA process, whereas the inclusion of the VMT metric transition would only add additional requirements to said process and cost those trying to bring their projects into compliance more needless expenses. Specifically, the Chamber recommends that the VMT measurement not be incorporated for infill projects. This would be counterproductive to the streamlining intent and serve to duplicate the effort of the already used LOS metrics used for reducing GHG emissions.

Due to these issues, the Irvine Chamber Commerce cannot support the guidelines for implementation of SB 743 as they currently stand. The Chamber, along with many other organizations that serve to advocate for the business and development community, urge you to make the needed changes to the guidelines for implementation of SB 743.

Sincerely,

A handwritten signature in black ink that reads "Tallia A. Hart". The signature is written in a cursive, flowing style.

Tallia Hart
President/CEO